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March 10, 2005

Mr. Joseph Cosentino United States Environmental Protection Agency 2890 Woodbridge Avenue, Bldg. 209, Mail Stop 211 Edison, New Jersey 08837

VIA FAX AND U.S. MAIL

RE: Bayonne Barrel & Drum Site, Newark, NJ Progress Report No. 13

Dear Mr. Cosentino:

On behalf of the Bayonne Barrel & Participating Parties and pursuant to Paragraph 23 of the Administrative Order on Consent, enclosed please find three (3) copies of Progress Report No. 13 covering the period from February 1, 2005 through February 28, 2005.

Very truly yours,

de maximis, inc.

William J. Lee

cc: S. Flanagan, USEPA

S. Kehaves, NJDEP

J. Jones, City of Newark

J. Allaire, Kirkpatrick & Lockhart

W. Hyatt, Kirkpatrick & Lockhart

D. Reid-Green, BASF

J. Vidumsky, DuPont

BAYONNE BARREL & DRUM SUPERFUND SITE PROGRESS REPORT NO. 13 February 1, 2005 through February 28, 2005

Description of the Actions Taken Toward Achieving Compliance with the Administrative Order on Consent Since the Previous Report:

- An email response to EPA's January 25, 2005 email seeking further clarification about treatment of roll-offs sent to Ross Incineration Services was sent on February 3, 2005.
 In subsequent follow-up exchanges, EPA concluded in their e-mail of February 10, 2005 that there is unlikely to be any benefit from continued discussion.
- Site security continues to be maintained at the site with guard service and video surveillance.
- The Remedial Investigation Report prepared for submittal to the NJDEP pursuant to the Technical Requirements was submitted on January 18, 2005.
- Preparation of the Remedial Action Selection Report for the site is underway, with completion projected for April 2005.
- Clean Harbors was contacted to find their determination following sample receipt of acceptance of the material in the roll-offs. They responded that their evaluation has not been completed. Alternate disposal proposals are being solicited from other outlets. EPA has recommended additional analysis for waste characterization be conducted, and plans are proceeding accordingly.

Summary of all Results of Sampling, Tests or Other Data Received or Generated Since the Previous Report:

None.

Completed Deliverables Since the Previous Report:

None.

Actions Planned Prior to Submittal of Final Completion Report:

- Transport roll-off boxes with Courtyard residue off-site for disposal.
- Sample ASP-1, 2 and 3 after transport of roll-offs and weather permitting.
- Prepare documentation of all site disposal activities.



Mr. Joseph Cosentino Bayonne Barrel & Drum Superfund Site Progress Report No. 13 March 10, 2005

- Submit Progress Report No. 14 April 2005.
- Continue Monthly Progress Reporting.

Percentage Completion:

Work Plan Submittal and Approval- 100% Construction Operations Plan Implementation - 95% Post-Removal Site Control Plan - 0% Final Report - 0%

Delays Encountered or Anticipated:

None currently identified.